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CLARICK GUERON REISBAUM VELL@CGR-LAW.COM

ARON H. CROWELL 646 398 5065

By Fax: 212 805 6111

March 24, 2014

Hon. Henry Pitman United States District Court for the Southern District of New York 500 Pearl Street, Room 920 New York, NY 10007

De Sole, et al. v. Knoedler Gallery, LLC and Ann Freedman, 12 Civ. 2313 (PGG) (HBP) Howard, et al. v. Ann Freedman, et al., 12 Civ. 5263 (PGG) (HBP)

Dear Judge Pitman:

On behalf of plaintiffs in the above-noted actions, we write to request an adjustment to the schedule for the upcoming damages inquest regarding defaulted defendants Glafira Rosales and Jose Carlos Bergantinos Diaz. This Court's orders currently provide that plaintiffs will submit proposed findings of fact and conclusions of law concerning damages on April 7, 2014 with respect to Rosales (with any response due May 7), and will submit the same with respect to Bergantinos Diaz on April 18 (with any response due May 19). Because plaintiffs anticipate that the proposed findings of fact and conclusions of law with respect to these two defendants will be essentially identical, we respectfully request leave to make a single submission concerning both defendants on April 18, with both defendants' time to respond scheduled for May 19.

We have contacted counsel of record for the defaulting defendants regarding this proposal but received no response. ABBLICATION

Respectfully submitted,

SO ORDERED

a RANTED

Aaron H. Crowell

UNITED STATES MAGISTRATE JUDGE

-24-14

Anastasios Sarikas, counsel of record for Rosales and Bergantinos Diaz (via email) cc: